

Comment Letter AS004 Continued

Morshed and Rutter
August 19, 2004
Page 3

We are particularly concerned that once a preferred alternative and a route is selected at the final program environmental document stage, that subsequent more detailed studies and analysis to provide "opportunities to avoid or minimize impacts" will come too late to correct earlier decisions based upon incomplete or erroneous information. For this reason we encourage the High-Speed Rail Authority and the Federal Railroad Administration to carefully consider our suggestions and recommendations prior to committing to a decision resulting in the loss of the public's natural, cultural, aesthetic and recreational resources of the California State Park System patrimony.

In summary, and as presented in more detail in the accompanying comments, California State Parks urges the California High-Speed Rail Authority and the Federal Railroad Administration to adopt a program environmental document which avoids direct or indirect impacts to units of the California State Park System. As recommended in our comments, further detailed study and analysis is necessary for any subsequent specific environmental document prepared for this project if it is in the proximity of units of the State Park System. Major deficiencies in the cumulative impact, recreation, and environmental justice analyses should be remedially addressed. Any impact to the units of this system as a result of the adopted preferred alternative requires full and timely mitigation for natural, cultural, and aesthetic resources, and recreational impacts prior to project commencement in order to make the people of the State of California whole for their loss.

As this project proceeds through the program environmental review process and the next stage of project specific environmental analysis and review, we anticipate that we will be able to further identify and fine-tune these issues and possibly bring others to your attention. If any of our current comments need clarification or further explanation please do not hesitate to contact Noah Tilghman, who has acted as lead in preparing the attached comments on the "Draft California High-Speed Train Draft Program EIR/EIS," at (916) 653-3460 or ntlg@parks.ca.gov.

Sincerely,



Ruth Coleman
Director

cc: State Clearinghouse
Department of Water Resources, DPLA Unit
Resources Agency

COMMENTS ON
"DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT /
ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED DRAFT CALIFORNIA HIGH-SPEED TRAIN SYSTEM"
SCH# 2001042045

By
California Department of Parks and Recreation

The State of California, through passage of park bond acts and the actions of the Legislature and the Governor, sets aside public funds for the purchase of areas of outstanding scenic or natural character, containing significant historical, archaeological, ecological, geological, or other similar values. These lands become part of the California State Park System and, by statute, are to be protected for current and future generations. It is therefore important to consider, when preparing an environmental document evaluating a proposed project's impact upon parklands, the values that are intrinsic to these lands and that make them worthy of protection.

A specific area's value as parkland takes factors into consideration, including aesthetics, which contribute to its sense of place. The intrinsic values contributing to sense of place pertain to the essential and inherent nature of a place—aspects that are not necessarily defined by law, science, or economics. Sense of place identifies a site's unique experiential essence (sensory, emotional, intellectual, and spiritual) which sets it apart from all other places. It describes the distinctive characteristics that a site possesses; which includes the elements that determine the uniqueness of its landscape, resources, development as a park, and history. These characteristics are part of what makes a particular site a worthwhile park unit. Components of a site's identity or sense of place include:

- The site's physical features and appearance. These may consist of the actual physical structure, characteristics, and all visible features of a place. This includes physiography, natural features, cultural features, land use, development intensities, visual quality, community character, climate, seasonal changes, etc.,
- The site's activities, functions, and events. That is, how inhabitants or visitors interact with a space, i.e. how the landscape and the built environment are occupied or used (activity levels and use intensities). This can also include natural resource-based activities or events such as whale or bird migrations,
- The site's meanings and symbols. The concept of place as a cultural artifact, a place's meaning or value beyond its physical elements. This includes people's experiential responses (emotions, feelings, and physical/intellectual stimulation) when they visit a park and the memories created by their park experiences that will become a part of their personal history. An example would be the value of

AS004-1
cont.

AS004-2

Comment Letter AS004 Continued

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 2

- Trestles (San Onofre State Beach) to the surfing community and its worldwide renown as one of Southern California's premier surfing locations and its role in surfing history.

There is a public expectation that once an area is set aside for park purposes that it will be protected forever. The California Public Resources Code determines the general types of uses that may occur within the various State Park System classifications. The more specific park unit general planning process, which includes public participation, sets forth density and intensity of uses, their location and designates protected areas.

Visitors expect to be able to experience recreation in a setting appropriate to the unit's location as a counterpoint to commonplace daily life. Generations of park volunteers, advocates, public officials, donors, and taxpayers have trusted the State of California to preserve and protect its State Park System units now and into the future. The public does not expect or anticipate that, once secured, their parks will suffer incursion by the very features and day-to-day activities they expect to leave behind them.

The High-Speed Train (HST) project, as proposed, would have negative impacts on the sense of place at State Park System units where passing trains would interfere with and/or degrade the park experience. This situation would be most problematic for proposed alignments that place rail corridors through or in close proximity to State Parks System units and adjacent public land. Specific concerns, deficiencies, park-by-park impacts, recommendations for additional subsequent analysis and mitigation for the Final California High-Speed Train Draft Program Environmental Impact Report / Environmental Impact Statement are presented in the sections which follow. Information is also provided about requirements for gaining access to State Park System units for data collection and right-of-way studies.

ALTERNATIVES

It is difficult to fully assess the impacts of the intermodal alternative of the HST system on the California State Park System without information on local transit access linkages in various areas served by other transportation system components. Only a brief mention is made of intermodality (page 3.7-11), without tables, figures, or other data to support the discussion.

Can the HST system improve access to public parks? With the possible exception of highly urbanized areas such as downtown Sacramento and San Diego, we can identify no parks with direct access from a proposed HST station. The document does not speak to enhancement of access to public facilities. The Draft Program EIR/EIS should be revised to provide greater specificity as to how the HST project fits in with the balance of the state's transportation system, including public transportation (bus and

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 3

rail) and bikeway linkages suitable for access to public facilities, such as parks, in the vicinity of HST stations. Such information should be given not only for the existing system, but also for the system enhancements anticipated by the State Transportation Improvements Plan and the several Regional Transportation Improvements Plans.

With the exception of the early stages of a regional study by the San Diego County Regional Airport Authority which may include consideration of a new San Diego Airport near Anza-Borrego Desert State Park and the Foothill-south Tollway proposal in southern coastal Orange and northern coastal San Diego Counties (SCH 2001061046), we know of no current proposals to put new modal alternatives through or in proximity to units of the State Park System. Yet, the HST proposal would do just that in several instances. The document suggests the HST proposal is superior to the modal alternative. This finding apparently overlooks the inherent absence of land consumption impacts on State Park System lands in the modal alternative.

While the draft EIR provides some acknowledgement of the adverse impacts of HST alignments that cross State Park System units, the impacts are characterized as simple reductions of open space land. Beyond that problem is the deterioration of the natural, cultural, and aesthetic resources of the natural environment and recreational experiences of park users. State Parks are by definition (PRC § 5019.53) and as discussed in the section above, areas of outstanding scenic or natural character, containing significant historical, archaeological, ecological, geological, or other similar values. The purpose of the State Park System is to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California. Therefore, by their very nature parks, once degraded by intrusive influences, cannot be easily replaced.

The California Department of Parks and Recreation encourages the California High-Speed Rail Authority and the Federal Railroad Administration to consider only rail corridor alternatives which avoid either direct or indirect impacts to units of the California State Park System and other critical publicly and privately protected conservation lands in order to avoid habitat fragmentation and degradation of publicly held natural resource values. For example, we suggest reconsideration of the northernmost crossing of the Diablo Range (the so-called Altamont Pass alignment). This choice will avoid direct and indirect impacts to Henry W. Coe State Park and the San Luis Reservoir State Recreation Area. The draft environmental document asserts that this recommendation could work against ridership, a questionable premise given the draft EIR's lack of attention to how HST users will get to and from the HST stations.

We believe there is another viable approach, one that would use regional transportation networks to feed HST users to the HST system from their origins and from the HST system to their final destinations. For example, the Bay Area's considerable investment in public transportation and highways can serve well as the feeder network to a Bay Area terminus at either a Livermore Valley BART station or a

AS004-4
cont.

AS004-5

AS004-6

AS004-7

AS004-8

AS004-2
cont.

AS004-3

AS004-4

Comment Letter AS004 Continued

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 4

BART extension eastward from Pleasanton. The San Jose area would be served by full deployment of the Santa Clara Valley Transit Authority's bus and light rail system, with the addition of the planned BART leg to San Jose.

The HST project business plan and draft EIR documents should be revisited to consider approaching HST as if it was an airplane-like mode of transportation. The system can be reconfigured to connect Northern and Southern California regional hubs, linking them to central cities with local transportation network components. For Northern California, the hubs could be co-located with BART stations in Tracy or the Livermore Valley for the Bay Area hub, in Sacramento (at a light rail station) for the Sacramento Valley hub, and a Fresno hub (plus perhaps Stockton and Bakersfield) to serve the San Joaquin Valley. For Southern California, regional hubs could be at Palmdale (Metrolink service) and San Diego (MTS and/or Coaster), with perhaps an additional hub in Ontario or San Bernardino (Metrolink and other regional/local transit). HST users could reach those hubs in much the same manner as airport users do, without undue inconvenience or degradation of total travel times. The overall infrastructure cost of such a system would be greatly reduced due to the lessened requirement for urban-area construction and operations. Economies of scale would flow from increased reliance on local and regional transportation infrastructure. Environmental benefits, including protection of the integrity of parks and openspace, would result from this kind of more efficient delivery. Further system efficiencies and cost recovery could be obtained by designing HST urban area peripheral hubs for optimal freight handling as well as passenger travel.

Under the draft EIR's current scenarios, using the San Francisco Bay Area as an example, departing HST riders must travel to HST stations anyway from their numerous points of origin throughout the Bay Area. Arriving HST users would disperse throughout the Bay Area from those several HST stations. As currently proposed, the array of stations in selected central Bay Area cities (e.g. San Jose, San Francisco or Oakland) constitutes a more extensive set of hubs than our suggestion, with a considerably higher system cost. From the passengers' points of view, the regional-hub-and-local-spoke approach is conceptually the same as would occur under the proposals advanced in the draft EIR. The draft EIR should evaluate use of the regional-hub-and-local-spoke system design in comparison to the more costly designs that harm parks and open space.

AIR QUALITY

The Los Angeles to San Diego (LOSSAN) corridor is proposed to be the only alternative route which would not use electrical powered locomotives. The air quality impacts of diesel powered trains are not evaluated in the Air Quality Section 3.3 of the Draft Program EIR/EIS. The twelve units of the California State Park System along this corridor are all located in close proximity to the proposed rail route and station and

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 5

could be impacted by locally degraded air quality due to this source. These impacts to State Park System units should be addressed, analyzed and suggestions for mitigation if necessary proposed in a Final Program EIR/EIS.

NOISE IMPACTS

The California Department of Parks and Recreation retained the services of Dr. James D Foch, Ph.D, of Foch Associates to assist in the review of the noise sections of the Draft Program EIR/EIS. Dr. Foch is a physicist with over 37 years of professional experience in environmental acoustics. Most recently, he is Senior Researcher and Analyst with the Lawrence Livermore National Laboratory, he was the past Director of the Noise Technical Assistance Center at the University of Colorado, has extensive experience in analyzing the noise impacts of a variety of highway, rail, air and extractive industry projects on national, state, and local parks, as well as other environmentally sensitive publicly protected lands, and has frequently served as an expert witness.

Following his review and analysis of Subsection 3.4, "Noise and Vibration," Dr. Foch concluded that for parks and recreation areas there are two fundamental flaws in the Draft Program EIR/EIS. First, the use of the day-night average sound level L_{dn} to characterize intruding noise and ambient sound is inappropriate. Second, the use of health and welfare criteria to gauge the noise impact of the proposed action is specious.

Noise intrusion interferes with the enjoyment of parks or recreation areas. Each single intruding noise event will do so if it is loud enough to dominate the ambient sound environment at a location for a short time. Thus, both intruding noise and ambient sound should be characterized well enough to decide whether the intruding noise does dominate the ambient sound. This requires reliable one-third octave band information about the intruding noise in the park or recreation area (not 100 feet from the alignment). It also requires reliable one-third octave band information about ambient sound in the park or recreation area, especially ambient natural sound. Finally, some judgment must be made about permissible intruding noise using audibility or acoustic detectability.

Regarding the "Ambient Sound Condition" sub-section of Section 3.4.6, "Subsequent Analysis," long term monitoring should include overall and one-third octave band measurements every second. It is important to quantify both diurnal and seasonal variations. Such information is necessary to determine whether the intruding noise dominates the ambient sound environment.

In the "Project Noise Conditions" sub-section of Section 3.4.6, "Subsequent Analysis," the HST data should span representative train speeds and include time histories for overall sound level and one-third octave band levels. Time histories are important because L_{max} for conventional trains is due to the locomotive, but most of the

AS004-9
cont.

AS004-10

AS004-11

AS004-12

AS004-8
cont.

AS004-9

Comment Letter AS004 Continued

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 6

time history is due to railcars, which are less noisy. Dr. Foch conjectures that the same is not true for the HST. If he is correct, it may be that Figure 3.4-7 makes a misleading comparison between a HST at 125 mph and a conventional train at 79 mph.

Data for representative train speeds are important because he surmises, again from Figure 3.4-7, that aerodynamic noise from the HST increases as $44 \times \log\left(\frac{V}{V_{ref}}\right)$, where V is the HST speed, and V_{ref} is a reference speed. This is a much more rapid increase of noise with train speed for the HST than occurs for a conventional train.

The Draft Program EIR/EIS Summary refers to HST speeds in excess of 200 mph, and an operating speed of 220 mph is mentioned on page 3.4-10, second paragraph. Because of the rapid increase of sound level with speed, the HST top speed should be identified.

In the Noise Propagation Characteristics sub-section of Section 3.4.6, "Subsequent Analysis," temperature inversions and downwind propagation can increase HST noise levels at appreciable distances by as much as 20 dBA. Both should be considered in the Draft Program EIR/EIS.

In the Impact Criteria sub-section of Section 3.4.6, "Subsequent Analysis," even the largest screening distance in Table 3.4-A-1, 900 feet, is too small for parks and recreation areas. Using the "typical" L_{max} values for the HST noise at 200 mph and 100 feet, Dr. Foch estimates the HST noise at 200 mph and 900 feet to be approximately 76 dBA.

For each affected park, the Draft Program EIR/EIS should disclose to the reader the HST noise at the screening distance. Using the L_{dn} health and welfare criterion of 65 dBA, the Draft Program EIR/EIS should also disclose to the reader what HST noise level would breach the health and welfare criterion.

If the HST System becomes a reality, there will inevitably be some future desire to increase its top speed. While increased HST speeds may be far off, we should be asking now how much worse any putative noise impact could become, and the impacts on park and recreation resources should be addressed now.

Mitigation strategies reviewed (beginning on page 3.4-23) by California State Parks seem to be limited to sound walls in some heavily populated areas. Many units of the California State Park System are located in rural areas with low existing ambient noise levels. Sound walls in such areas appear to be impractical due not only due to their cost but also because of their aesthetic impact in rural settings and potential for additional habitat fragmentation. Due to the identified noise levels of the HST train project, further effort at identifying methods to reduce noise generation in park, wildlife, and recreation areas is necessary. If there have been studies of existing HST systems

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 7

in Europe and Japan that analyze or address such impacts, their conclusions should be presented and discussed in the Final Program EIR/EIS.

AESTHETICS AND VISUAL RESOURCES

As discussed in other sections of these comments, many units of the California State Park System are established in large part because of their aesthetic values such as natural and cultural landscapes. Modifications or intrusions into these parks or in proximity to parks may irreparably diminish the values for which these parks were created. For this reason we believe that most parks in proximity to proposed alternative HST corridors will suffer high visual impacts.

We concur in the discussion of the HST alternative in the "Environmental Consequences" section on page 3.9-11, that the "landscape typologies considered scenic and therefore most subject to high-contrast visual changes—where the HST would begin to dominate the landscape and detract from the existing features—are the natural open space and park typology and the traditional small urban community typology." We disagree however with the conclusion in the subsequent paragraph that "At this program level of analysis, there are no potentially high aesthetic or visual impacts that could not be reduced or mitigated through design treatments (e.g., architectural treatment at historic stations, tunneling, or minimizing the cut and fill through mountainous terrain and in natural areas)." There is no evidence presented, certainly not the visual simulations prepared for the Draft Program EIR/EIS, that would lead us to believe that new linear elements and minimization of cuts and fills all result in full mitigation of the impacts. As an example, the conclusion for the Sacramento to Bakersfield region for the HST alternative that "all potential HST alignment options in this region were ranked as having low potential for visual impacts; only stations would have potential visual impacts because of the proximity to historic structures and architecture" is incorrect. An at-grade use of the existing BNR alternative route at Colonel Allensworth State Historic Park would clearly infringe upon the historic landscape and degrade its visual setting.

As in the example of Colonel Allensworth State Historic Park, many units of the California State Park System, such as Hungry Valley State Vehicular Recreation Area (SVRA), the Taylor Yard and Cornfield properties, San Luis Reservoir State Recreation Area, San Onofre State Beach, Old Town San Diego, and most of the State Beaches along the various route segments are ignored by the analysis presented.

The analysis presented in section 3.9 of the Draft Program EIR/EIS focuses primarily on an identification of scenic areas. Further specific analysis should focus on and identify critical public viewing areas such as highways, trails, pullouts, parks and beaches as well. Missing from the analysis is consideration of the potential impact of mitigations proposed for other impacts, such as soundwalls. Highly scenic areas are

AS004-16
cont.

AS004-12
cont.

AS004-13

AS004-14

AS004-15

AS004-16

AS004-17

AS004-18

Comment Letter AS004 Continued

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 8

more than what can be viewed from the train, but should include the intrusion of the linear corridor into the landscape as well. In particular, the scenic and visual qualities of coastal areas should be considered and protected as scenic resources of public importance. Public Resources Code § 30251 requires that permitted development be sited and designed to protect views to and along the ocean and scenic coastal areas, minimize the alteration of natural land forms, be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the "California Coastline Preservation and Recreation Plan" prepared by the Department of Parks and Recreation (1971) shall be subordinate to the character of its setting (PRC § 30251).

Short-term impacts associated with the construction phase, such as access roads and corporation and storage yards, should also be discussed and their locations analyzed in specific environmental documents which are to follow adoption of this Draft Program EIR/EIS. Site-specific restoration efforts to return these temporary sites to a natural appearance through remedial grading and replanting with locally-obtained, naturally-occurring plant species should be detailed as well.

Specific concerns on an individual park unit basis are presented in "SPECIFIC STATE PARK SYSTEM UNIT COMMENTS" below.

ENVIRONMENTAL JUSTICE

As public lands, units of the California State Park System are open to all regardless of race, culture, or income. The discussion of environmental justice in Section 3.7 should be revised to consider how recreation lands, which provide benefits to all populations, might be altered by the HST project in ways that result in lower quality recreational experiences for park users.

The discussion of "Impacts on Neighborhoods", states at page 3.7-3, "A potential impact on a community or neighborhood was identified if an alternative would create a new physical barrier, isolating one part of an established community from another and potentially resulting in a physical disruption to community cohesion. Improvements to existing transportation corridors, including grade separations, would not generally result in new barriers." In Table 3.7-1 a "low compatibility" rating is assigned to neighborhood parks and a "medium compatibility" is assigned to community parks. This Section should be revised. Communities use adjacent parks in their own ways, whether the parks are of neighborhood scale, community scale, regional scale, or state parks. For example, if a state park adjoins a neighborhood, and thus provides a community with recreation opportunities, residents tend to use the facility as if it were their own neighborhood park. They might take their children to a state beach close to their home, or take a stroll on state park trails close to their home, etc. Furthermore, even when residences are far from a state park, state park campgrounds and day-use facilities can

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 9

function as the yard space for residents whose home neighborhoods do not offer room for outdoor recreation. It is thus recommended that the section restructure its impact tables to assign a "low compatibility" rating to alignments that interfere with access to public parks and enjoyment of all recreation opportunities at public parks.

Disruption of the normal setting in a neighborhood can occur beyond the 50' cutoff (page 3.7-4) used to characterize land use adjacent to the HST alignment. It is suggested that the distance for perception of an adverse impact be increased to at least a quarter mile, consistent with points made in "SPECIFIC STATE PARK SYSTEM UNIT COMMENTS" which follow. Also, in the paragraph entitled "Existing Land Uses" in discussion of the Los Angeles-to-San Diego via Orange County corridor on page 3.7-10, the word "community" should be deleted from the last sentence to reflect the argument in the preceding paragraph.

A discussion of important environmental justice issues specific to the recently acquired Taylor Yard and Cornfield properties in downtown Los Angeles can be found within the Cornfield project presentation in the section, "SPECIFIC STATE PARK SYSTEM UNIT COMMENTS."

RECREATION

The proposed project has the potential for resulting in direct physical or reasonably foreseeable indirect physical changes in the State of California's recreation environment. This is particularly problematic since the draft program EIR/EIS does not refer to overarching statewide recreation plans issued by our Department, such as California Outdoor Recreation Plan 2002 and the California Recreational Trails Plan Phase I June 2002.

While there is no standard definition of recreation, the 1993 version of the California Outdoor Recreation Plan (CA DPR April 1994) described it as "a human activity, an experience undertaken primarily for the satisfaction of the participant. In recreating, individuals creatively develop their innate capacities, intelligently use their energies, and enrich their lives. Recreation is a necessary human need, essential for the physical, mental and spiritual well-being of the individual and society." Recreation use overlaps many other environmental issues such as natural and cultural resource protection, water and air quality, etc., and is sometimes indistinguishable. The proposed project has the potential to impact areas used for such recreational purposes directly by its physical location and indirectly by altering pre-existing conditions conducive to recreational activities such as through noise propagation, natural and cultural resource impact and the economic impact recreation losses will have on the local economy.

The importance of recreation in modern society cannot be overestimated. The opportunity to alter the pace of modern life and experience historic and natural settings

AS004-18
cont.

AS004-19

AS004-20

AS004-21

AS004-21
cont.

AS004-22

AS004-23

Comment Letter AS004 Continued

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 10

or more actively participate in outdoor activities has been shown to improve societal well-being by maintaining the physical and emotional health and wellness of individuals and contributes to reduction in crime. Recreational activities on State, local, and regional parklands, open space, and trails provided strong support for community values and serves as a mechanism and social bridge for integrating people of all races, ages, incomes and abilities. These lands educate, challenge, inspire and entertain our children, offer safe and secure places for families and seniors, protect and conserve our natural and cultural resources. They also help to strengthen and stimulate California's economy through recreation-related sales of clothing, equipment, fees and services and the revenues generated from the tourism and hospitality industries. As California's population is expected to grow by nearly 30% in the next quarter century, the demand for recreational resources and open space to support this population requires the provision of additional recreation land and facilities to respond to population demand as well as increased efforts to protect existing lands dedicated to this recreation purpose.

These factors are addressed through a recurring statewide recreation planning process for which the most current Plan is the California Outdoor Recreation Plan 2002. It can be found on the web at: <http://www.parks.ca.gov/pages/22545/files/2002corp.pdf>. We recommend use of this document as a foundation for evaluating potential impacts to recreation lands and facilities and the establishment of appropriate mitigation measures.

In the Draft Program EIR/EIS, issues relative to impacts to recreation resources are spread throughout the Draft Program EIR/EIS. For instance, Draft Program EIR/EIS Section 3.16, "Section 4(f) and 6(f) Resources" addresses loss of park and open space lands. However, other important recreational impacts are not addressed. One example is public recreation trails and plans.

As previously indicated, the California Recreational Trails Plan, Phase I (<http://www.parks.ca.gov/pages/1324/files/trails%20plan%20part%20final%203.pmd.pdf>) of 2002, is not referenced or addressed by the Draft Program EIR/EIS. Among many other goals, this plan seeks to "Promote and encourage the incorporation of trails and greenways development and linkages into all local and statewide land use planning processes." To facilitate these goals the California Recreational Trails Plan contains a state map with some of the State's major trails. Many of these trails are traditional routes. However, increasingly, trails are acquired to provide public access, improve transportation alternatives and to connect publicly protected openspace and recreational areas. Many trails have multiple recreation benefits such as providing access to fishing, vista points for photography, picnic areas for socializing, and camping areas. They also provide access to areas for enjoying solitude, observing wildlife and experiencing the natural environment. Such trails provide low-cost recreational opportunities to all segments of society, fostering a stronger sense of community as well as healthful recreation opportunities. Preliminarily, it appears that the following existing or planned long-distance trail routes may be affected by intersection (some more than once) with various alternate proposed HST corridors.

AS004-23
cont.

Morshed and Rutter
Comments on High-Speed Train DEIR
August 19, 2004
Page 11

- Pony Express National Historic Trail,
- Mokelumne Coast to Crest Trail,
- SF Bay Trail,
- Juan Bautista de Anza National Historic Trail,
- Bay Area Ridge Trail,
- San Joaquin River Trail,
- Santa Clara River Trail,
- Rim of the Valley Trail,
- LARio Trail,
- San Gabriel Trail,
- Santa Ana River Trail,
- Coast-to-Crest San Dieguito,
- Trans County Trail, and
- Pacific Crest Trail.

In addition to trails in the planning stages such as the Heritage Trail at Cornfield, there are many regional and local trails that require identification.

We urge project-specific identification of trails which may be crossed by HST alignments and stipulation of mitigation providing for and guaranteeing grade-separated crossings of trails when they intersect the selected HST corridor. The HST Project can also promote trail-based recreation by providing access, information and interpretation.

As the totality of the affected environment of recreational resources impacted by the proposed project is not presented, impacts to recreation are not discussed and analyzed, or mitigations measures for loss of recreational opportunities suggested and brought together in a single location, this Department suggests that the disparate parts of the Draft Program EIR/EIS should be pulled together into a separate recreation chapter. In addition, the loss of or significant impact to recreation should be considered a socio-economic effect. The Program EIR/EIS sections, which address socioeconomic effects and environmental justice issues, should also analyze and propose mitigation for the secondary effect that the loss of recreation will have on local economies. As a Responsible Agency for this project, the California Department of Parks and Recreation will depend upon the Draft Program EIR/EIS as a basis upon which we will review any application for use or entrance to lands of the State Park System. Without the recreation issues addressed, this document will be inadequate for our use.

AS004-23
cont.

AS004-24

CULTURAL RESOURCES

The information in Section 3.12 is, like other sections in the Draft Program EIR/EIS, based upon existing data sources (note that the Office of Historic Preservation is

AS004-25